Before the Federal Communications Commission Washington, DC 20554

In the Matter of)	
)	
Request by Pima County, Arizona)	DA Docket No. 11-1189
For Waiver of the Commission's Rules to Extend the)	
Deadline for Transition to Narrowband Operations)	
in the 150-174 MHz and 421-512 MHz bands)	

REQUEST FOR TEMPORARY WAIVER

Paul Wilson
PCWIN Project Administrator
Pima County Wireless Integrated Network
33 N. Stone Avenue, Suite 1810
Tucson, Az. 85701
(520) 724-7200
Paul. Wilson@pima.gov

Larry Sayers
PCWIN Site Development Manager
Pima County Wireless Integrated Network
33 N. Stone Avenue, Suite 1810
Tucson, Az. 85701
(520) 724-7200
Larry.Sayers@pima.gov

REOUEST FOR TEMPORARY WAIVER

Pursuant to Section 47 C.F.R. § 1.925(b)(3), and the guidelines issued in the Public Notice, DA-11-1189, Pima County, Arizona respectfully submits this Request for Temporary Waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands to permit specific participants of the Pima County Wireless Integrated Network Project to transition from their legacy VHF/UHF systems to a new regional 800 MHz public safety voice radio network.

Granting the requested waiver would allow the PCWN Partners to apply their human and fiscal resources towards deployment of a single countywide 800 MHz public safety voice radio network, instead of upgrades to legacy systems that would only provide short term benefit. This request serves the public interest and is consistent with the Commission's goals.

Pima County and its partners, seek a waiver of the Commission's rules and a grant of authorization to continue VHF/UHF wideband operation until July 1, 2014. The amount of time for which a waiver is requested is no more than is reasonably necessary to complete the construction of the new regional radio network. This waiver would prevent unduly burdensome efforts and cost to replace equipment that will not be used after July 1, 2014.

For the past several years, Pima County has funded and is deploying a mission-critical P25 800 MHz public safety voice radio network that will combine the majority of county radio resources into a single interoperable 800 MHz voice radio network.

The PCWIN project is primarily funded through a \$92 million Pima County general obligation capital improvement bond approved by Pima County voters in 2004. The Project is authorized by Pima County Ordinance No. 2004-18. The funding for this project is subject to oversight of the Pima County Citizen's Bond Advisory Committee and the Pima County Board of Supervisors. The PCWIN Executive Management Committee (EMC) was appointed by the

Board of Supervisors to oversee project implementation. Construction on this multi-year project began in 2010 and is expected to be completed in 2013 with testing and cutover to take place in early 2014. A high level schedule of implementation tasks is attached as Exhibit A.

The PCWIN project has two primary objectives: (1) replace disparate VHF and UHF radio systems with the implementation of a modern, state-of-the art, 800 MHz countywide regional interoperable public safety communications system, and (2) construction of a regional emergency communications and operations center.

The PCWIN voice radio network will serve a population of almost a million residents and over 300,000 households living in an area of approximately 9200 square miles, which is only slightly smaller than the entire State of Maryland. The 29 PCWIN partners currently operate a mixture of VHF, UHF and 800 MHz voice radio systems. The PCWIN project will replace most existing systems with a single countywide 26 site 800 MHz trunked radio system. This shared system will be connected to nine separate dispatch centers with ten separate 9-1-1 Public Safety Answering Points (PSAPS).

The PCWIN network partners consist of the agencies empowered by Pima County Ordinance 2004-18. The partner agencies are listed Exhibit B:

Some of the partner jurisdictions have relied on the availability of the new regional communications network to avoid the need to narrowband obsolete equipment that will not be used after communications services are transitioned to the new network. Unfortunately, and despite the community's best efforts, the new network will not be available until early 2014. The PCWIN Executive Management Committee directed staff to prepare a Regional Request for Temporary Waiver on behalf of any PCWIN participant agencies that were counting on the PCWIN project to provide a solution to their narrowbanding requirements. The County surveyed the twenty-nine PCWIN Participant agencies to determine their need to participate in this waiver

application. Those agencies that indicated a lack of resources to narrowband current equipment as an interim measure were identified as participants in this request. Six agencies were identified: Mt. Lemmon Fire District, South Tucson Police Department, South Tucson Fire Department, Tucson Police Department, and Pima County on behalf of the Ajo-Gibson Volunteer Fire Department and Why Fire District. The agencies wishing to participate in a waiver request were asked to complete a survey responding to the specific points of information included in the guidelines issued in the Public Notice. The submittals from each agency, including a list of the VHF/UHF licenses applicable to this Waiver Request are attached at Exhibit C. The exhibits include a description of licenses that are expected to be relinquished by the agencies after they complete their transition to the PCWIN communications network.

It is critical that the PCWIN participants identified herein be able to maintain their existing wideband VHF/UHF operations during the transition to the PCWIN communications network, and therefore, Pima County requests an extension of the deadline for transition to narrowband operations until July 1, 2014, on their behalf.

As outlined in the guidelines issued in the Public Notice, DA-11-1189, Pima County is providing the following information to address relevant factors in assessing that the Commission's waiver standard under Section 1.925 has been met.

Steps already taken to plan for, initiate, and complete the transition to narrowband operations:

Since 2004, Pima County has been involved in a multi-year project to consolidate disparate Public Safety radio systems into a regional 800MHz P25 interoperable system. In April 2009, Pima County entered into a contract with Motorola for the new voice radio system. Infrastructure for the new system will undergo factory acceptance testing in June 2012. Pima County has also contracted with Network Infrastructure Corporation to provide a backhaul

microwave communications network to support the Motorola voice radio system. The microwave equipment has been received at a local staging facility and is currently in the factory acceptance testing process. Pima County has been making communications site facility improvements over the past two years. These efforts are ongoing, but are scheduled to be completed in January 2013. Installation of the microwave equipment will commence in March.

2. System size and complexity:

When fully implemented, the new communications network will consist of a 26 site 800 MHz trunked radio system with three simulcast cells. This shared system will be connected to nine separate dispatch centers supporting ten separate 9-1-1 Public Safety Answering Points.

The backhaul communications network architecture integrates existing and new microwave and fiber communications assets for a SONET network with multiple microwave hops and redundant loop protection. This is a complex system.

3. Whether system equipment is narrowband-capable or must be replaced or upgraded:

There are four jurisdictions participating in this Request for Temporary Waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The answer to this question is unique to each affected agency. Please refer to the answers to the questionnaires in Exhibit C. Generally, each agency possesses equipment that would need to be replaced or upgraded as an interim solution to transitioning to the PCWIN voice radio network. It is not in the public interest to make a capital investment in equipment that will only be used for a short period of time.

4. Whether the licensee plans additional system upgrades or improvements in addition to converting to narrowband operation: Pima County plans to service the communications needs of a majority of the County's public safety service providers on the new 800MHz P25 system. Pima County has no plans to upgrade or improve the legacy systems of its partners. Many of the project partners intend to continue operating in the VHF/UHF bands in the future and have; therefore, taken steps to come into compliance with the narrowbanding requirements. This is not the case with the agencies represented by this application.

5. Funding sources, including whether the licensee's budget requires government approval or a multi-year budget process:

Pima County voters authorized the sale of \$92 million dollars in general obligation bonds to fund the PCWIN project; including the voice radio system and dispatch facilities. An additional \$10.5 million has been contributed to the project through various federal grant programs. The jurisdictions seeking a temporary waiver are not budgeted to upgrade or replace current equipment and do not wish to expend dollars on a temporary interim solution to PCWIN.

6. Whether the licensee's narrowbanding schedule is affected by neighboring systems due to interoperability relationships or other interdependencies:

Two interdependencies are noted.

• The request by the Pima County Sheriff's Department is made so that the department may continue to provide dispatch services for the Ajo-Gibson Volunteer Fire Department, Why Fire District, and Ajo Ambulance Company in Ajo, Arizona. Ajo is a small rural community approximately 130 miles west of the Tucson metropolitan area. Pima County is the licensee for a single VHF frequency on which dispatch services are provided. The County supports an obsolete repeater and base station to

not able to upgrade or replace the repeater, base station and legacy subscriber equipment at this time. The two fire agencies are participants in the PCWIN project, and it is possible that the ambulance company will also join the project. In any case, the County has a need to continue to operate their equipment until the PCWIN system is available to provide alternative communications capabilities.

- The South Tucson Police Department is dispatched by the Tucson Police Department,
 and is subject to the limitations of the City of Tucson communication systems.
 Because the City of Tucson is requesting a temporary waiver as part of this
 application, the City of South Tucson is doing the same.
- 7. Plans to minimize the negative impact of extended wideband operations on cochannel and adjacent channel operations, including a description of the spectrum environment in the affected areas:

The county does not foresee a negative impact of extended VHF/UHF wideband operations on co-channel and adjacent channel operations since the agencies are already coordinating with PCWIN for the transition to the new system.

8. If the licensee plans to migrate to a non-VHF/UHF band (e.g., 700 MHz or 800 MHz), whether it will relinquish VHF/UHF spectrum once it has migrated and the amount of spectrum to be relinquished:

The answer to this question is unique to each agency. Please refer to Exhibit C. The PCWIN voice radio system will initially use 800MHz spectrum exclusively. The PCWIN frequency plan has been submitted to Commission representatives for review with the 800MHz Rebanding Transition Administrator.

Pima County requests that the Commission grant the requested temporary waiver to allow the PCWIN partners sufficient time to transition to a countywide voice radio system.

To obtain a waiver of the Commission's rules, a petitioner must demonstrate either that: the underlying purpose of the rule(s) would not be served or would be frustrated by application to the present case, and that a grant of the waiver would be in the public interest; or (ii) in view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome, or contrary to the public interest, or the applicant has no reasonable alternative. An applicant seeking a waiver faces a high hurdle and must plead with particularity the facts and circumstances that warrant a waiver. Although a successful waiver petition needs to satisfy only one of the two tests, Pima County believes that it has demonstrated that this request satisfies both tests.

Under the first test, the waiver request should be granted if: (a) denying the use of the UHF/VHF spectrum, would not serve the underlying purposes of the Commission's plan, and (b) granting the waiver would be in the public interest. This waiver request easily meets both requirements.

The underlying purpose of the Commission's plans for narrowbanding is to create an environment that offers cooperation among public safety agencies to enhance service delivery to the public which is a primary objective of the PCWIN project.

Granting of this waiver would greatly serve the public interest and supports the Commission's goals of enhancing radio spectrum efficiency while promoting consolidation and interoperability among public safety radio users.

The unique circumstances for each of the individual petitioning agencies are described in the questionnaires attached as Exhibit C. Universally, the petitioners have no plans or budget to replace wideband equipment that will be decommissioned after they transition to the regional network by July 1, 2014. In the case of the City of Tucson, costs to narrowband current public safety communications equipment is estimated at \$1.7M. Agency resources are best applied to the successful implementation of the regional network. New purchases to replace obsolete equipment for what would be a temporary solution would be unreasonable and contrary to the public interest.

CONCLUSION

Pima County requests that the Commission grant a waiver that would allow the extension of time for the operations of existing non-narrowbanded VHF and UHF radio systems that support public safety dispatch communications for the Mt. Lemmon Fire District, South Tucson Police Department, South Tucson Fire Department, Tucson Police Department, Tucson Fire Department and the Pima County Sheriff's Department during the construction of the new PCWIN 800MHz regional radio system. The PCWIN partners have worked diligently and in good faith to transition their systems expeditiously; and believe the specific circumstances of this project warrant a temporary extension of the deadline. The amount of time for which a waiver is requested is no more than is reasonably necessary to complete the construction process. It is estimated the PCWIN partners will be transferred to the new system and it will be fully operational before July 1, 2014.

The majority of the PCWIN participant agencies operating legacy radio systems in the VHF/UHF bands are expected to meet the narrowbanding requirements by January 1, 2013 as they intend to continue to operate in those bands post implementation of the regional system.

Attached are cover letters from each agency requesting a waiver, along with their pertinent information and affected frequencies. In addition, Pima County has attached letters from PCWIN participant agencies in support of the extension request (Exhibit D).

Thank you for your consideration of this important Request for Temporary Waiver.

Respectfully submitted,

Paul Wilson

PCWIN Project Administrator Pima County Wireless Integrated Network

33 N. Stone Avenue, Suite 1810

Tucson, Az. 85701 (520) 724-7200

Paul.Wilson@pima.gov

Larry Sayers

PCWIN Site Development Manager

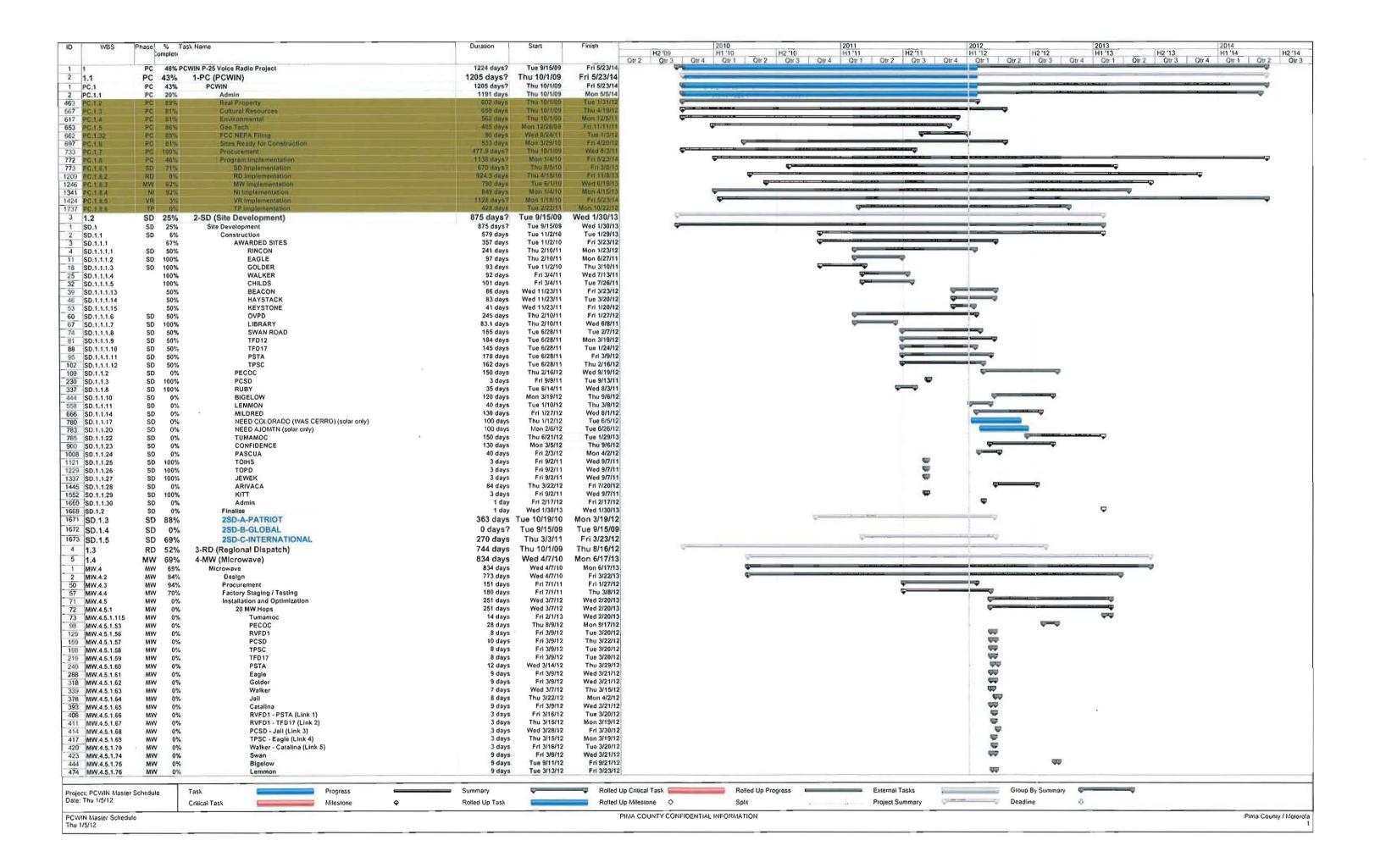
Pima County Wireless Integrated Network

33 N. Stone Avenue, Suite 1810

Tucson, Az. 85701 (520) 724-7200

Larry.Sayers@pima.gov

EXHIBIT A



Section Sect	ID WB\$	Phase	% T	ask Name	Duration	Start	Finish	2010 2011 2012 2013 2014
Ministry Ministry	1103			390 130110	Julian	Jun		H2 '09 H1 '10 H2 '10 H1 '11 H2 '11 H1 '12 H2 '12 H1 '13 H2 '13 H1 '14 H2 '14 Ott 2 Ott 3 Ott 4 Ott 1 Ott 2 Ott 3 Ott 4 Ott 3 Ott 4 Ott 1 Ott 2 Ott 3 Ott 4 Ott 3 O
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March Marc	52 MW.4.5.1.78 567 MW.4.5.1.79							
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March Marc	7 MW.4.5.1.81							
March Marc	MW.4.5.1.82							
March Marc	8 MW.4.5.1.85	MW	0%	Swan - Bigelow (Link 6)	3 days	Thu 9/13/12		
Windows Column	MW.4.5.1.86							
March 1	MW.4.5.1.88							
March 19	MW.4.5.1.89							
March 10								
Second Column Second Colum	9 MW.4.5.1.93	MW	0%	Beacon - Walker (Link 13)	3 days	Fri 3/30/12	Tue 4/3/12	7
March 19 March 19	2 MW.4.5.1.94							
March 19	8 MW.4.5.1.96							
March 19	1 MWV.4.5.1.100							
March Marc	MW.4.5.1.101							
March 19	3 MW.4.5.1.103	MW	0%	TOPD	0 days	Thu 3/8/12		
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March 2-10 10	4 MW.4.5.1.107							
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1	3 MW.4.7	MW	0%	System Testing	110 days	Tue 9/18/12	Mon 2/18/13	
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Mid-14-13 Mid-	NI.5.4.1.32			TFD17	2.5 days	Thu 3/22/12	Mon 3/26/12	•
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M.5.4.1-5 M 0	0 NI.5.4.1.43	NI	0%	TOPD	0 days	Thu 3/8/12	Thu 3/8/12	•
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Fig.	1 NI.5.6							
Fig. 2	VR.6							
VR.6.5	VR.6.2	VR	95%	Program Management Services	967 days	Fri 10/2/09	Mon 6/17/13	
R.6.5	VR.6.3							
R.6.6	VR.6.5		97%		766 days	Thu 12/10/09	Thu 11/15/12	
R.6.8	VR.6.6		0%	Manufacturing				
NR.8.3.1								
R.S. 8.1.15	VR.6.8.1	VR	0%	FNE at 27 Sites	173 days	Thu 11/1/12	Fri 7/12/13	
NR.5.8.1.22	VR.6.8.1.5							
VR. 6.8 1.35 VR 0%	VR.6.8.1.22	VR	0%	SWAN (Prime A) (Simulcast A&B Remote)	31 days	Mon 12/3/12	Thu 1/17/13	□
VR.6.8.1.23	VR.6.8.1.35	VR	0%	Tucson Simulcast A and 8 Prime Sites Ready	1 day			
VR.6.8.1.6	VR.6.8.1.16 VR.6.8.1.23							
VR.6.8.1.8	VR.6.8.1.6	VR	0%	TFD12 (Simulcast A&B Remote)	56 days	Mon 1/14/13	Thu 4/4/13	
VR. 68.1.9	VR.6.8.1.7							
VR.6.8.1.10	7 VR.6.8.1.9							
VR.6.8.1.37	7 VR.6.8.1.10	VR	0%	TPSC (Simulcast A&B Remote)	26 days	Fri 5/10/13	Tue 6/18/13	♀
CCI: PCWIN Master Schedule Task Progress Summary Rolled Up Critical Task Rolled Up Progress External Tasks Group By Summary Progress Thu 1/5/12 Rolled Up Milestone Rolled Up Milestone Split Project Summary Deadline Prima Country / Milestone Prima Country / Milestone Prima Country / Milestone	7 VR.6.8.1.13 7 VR.6.8.1.37	VR						
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IN Master Schedule PIMA COUNTY CONFIDENTIAL INFORMATION Pima County / M	te: Thu 1/5/12	- SUITEDU		1920				
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VR.6.8.1.26 VR.6.8.1.27 VR.6.8.1.28 VR.6.8.1.29 VR.6.8.1.30 VR.6.8.1.31 VR.6.8.1.32 VR.6.8.1.34	VR 0%	RUBY (Repeater Site) CHILDS (Repeater Site) HAYSTACK (Repeater Site) KEYSTONE (Repeater Site) BIGELOW (Repeater Site) MILDRED (DVRS- Coverage Extension Site) COLORADO (WAS CERRO) (DVRS- Coverage Extension Site) AJOMYN (DVRS - Coverage Extension Site)	16 days 15 days 16 days 16 days 16 days 13 days 13 days 13 days	Thu 4/4/13 Fri 4/26/13 Fri 4/26/13 Mon 5/20/13 Mon 5/20/13 Tue 6/4/13 Tue 6/4/13 Fri 6/21/13	Fri 4/26/13 Mon 5/20/13 Mon 5/20/13 Wed 6/12/13 Wed 6/12/13 Fri 6/21/13 Fri 6/21/13 Thu 7/11/13	
R.6.8.1.36 R.6.8.2 R.6.8.2.1 R.6.8.2.7 R.6.8.2.6 R.6.8.2.8 R.6.8.2.11	VR 0% VR 0% VR 0% VR 0% VR 0% VR 0% VR 0%	Master and RF Sites Complete Dispatch at 13 Sites PECOC 22ND (21 OPS) TPSC (34 ops) PCCPD(2 OPS) UAPD (3 OPS) PASCUIA (2 OPS)	1 day 61 days 51 days 46 days 7 days 7 days 7 days 7 days	Thu 7/11/13 Thu 1/31/13 Thu 1/31/13 Thu 1/31/13 Thu 1/31/13 Wed 2/13/13 Wed 2/27/13	Fri 7/12/13 Mon 4/29/13 Mon 4/15/13 Mon 2/11/13 Mon 2/11/13 Fri 3/8/13	
R.6.8.2.12 R.6.8.2.13 R.6.8.2.15 R.6.8.2.16 R.6.8.2.17 R.6.8.3 R.6.9	VR 0% VR 100%	TOPD/TOIHS (3 OPS TOPD/1 OP TOIHS) JAIL (4 OPS) AJOPCSD (2 OPS) OVPD (4 OPS) Dispatch Sites Complete Subscriber / Mobile Installation Integration and Preparation Site Installation Audils (Embedded at sites - see notes)	0 days 7 days 7 days 7 days 0 days 223 days 25 days 0 days	Thu 4/18/13 Fri 3/1/13 Thu 4/18/13 Thu 4/4/13 Mon 4/29/13 Tue 9/4/12 Fri 7/1/2/13 Thu 5/9/13	Thu 4/18/13 Tue 3/12/13 Mon 4/29/13 Mon 4/15/13 Mon 4/29/13 Wed 7/24/13 Fri 8/16/13 Thu 5/9/13	
/R.6.16 /R.6.11 /R.6.12 /R.6.13	0% VR 0% VR 0% VR 0%	R56 Punchlist Resolution of Motorola items System Testing Training Finalize	0 days 237.5 days 132 days 214.5 days	Fri 7/12/13 Thu 4/25/13 Man 9/9/13 Thu 5/30/13	Fri 7/12/13 Tue 4/8/14 Fri 3/21/14 Tue 4/8/14	

Summary

EXHIBIT B

Pima County Wireless Integrated Network Pima County Ordinance No. 2004-18 Authorized Participant Agencies

Police and Emergency Services Agencies

Oro Valley Police Department
Pascua Yaqui Police Department
Pima College Department of Public Safety
Pima County Sheriff's Department
Sahuarita Police Department
South Tucson Police Department
Tohono O'odham Tribal Police
Tucson Police Department
University of Arizona Police
Pima County OEM & Homeland Security

Fire Agencies

Ajo/Gibson Volunteer Fire Department Arivaca Volunteer Fire Department Avra Valley Fire District Corona de Tucson Fire District Drexel Heights Fire District Elephant Head Volunteer Fire Department Golder Ranch Fire District Green Valley Fire District Helmet Peak Fire District Mt. Lemmon Fire District Northwest Fire District Pascua Pueblo Fire Department Picture Rocks Fire District Rincon Valley Fire District South Tucson Fire Department Three Points Fire District Tohono O'odham Fire Department Tucson Fire Department Why Fire District

EXHIBIT C

Mt. Lemmon Fire District

- Cover Letter
- UHF/VHF Narrowbanding Questionnaire
- FCC Radio Frequency Information



December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Waiver request for temporary extension of deadline to narrowband existing VHF/UHF radio systems

The Mount Lemmon Fire District respectfully requests a waiver of FCC Rule Section 90.203(j) to be authorized a temporary extension of time to continue wideband operations on existing VHF and UHF radio systems. Our Fire District is part of a regional coordination plan and filing this request as one partner of the Pima County Wireless Integrated Network (PCWIN) coordinated waiver request. The amount of time for which a waiver is requested is no more than reasonably necessary to complete the move to the new regional 800 MHz PCWIN system.

By participating in the PCWIN project, the Mount Lemmon Fire District has committed to replacing its legacy VHF and UHF radio systems. Therefore, our Fire District is dependent on the project schedule and has no other reasonable alternative or additional resources to address narrowbanding for its legacy VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest. We believe a grant of this waiver request would be in the public interest since the intent of the PCWIN Project is to replace legacy systems with a single regional interoperable 800 MHz voice radio system, thereby satisfying the underlying purpose of the narrowbanding rule by promoting consolidation and spectrum efficiency.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until our Fire District is fully transitioned to the regional 800 MHz PCWIN system. If you have any questions or require additional information regarding this request, please feel free to contact me at (520)576-1201.

Sincerely

Fire Chief

Mount Lemmon Fire District

13170 N. Oracle Control Rd. P.O. Bax 759 Mt. Lemmon, AZ 89619 (520) 576-1201 (520) 576-3095 fax www.Mtlemmonfire.org

MOUNT LEMMON FIRE DISTRICT

UHF/VHF Narrowbanding Questionnaire

The Federal Communications Commission (FCC) has set January 1, 2013 as the deadline for all VHF and UHF Public Safety and Industrial/Business land mobile radio (LMR) systems in the 150-174 MHz and 421-512 MHz bands to migrate from 25 kHz channel bandwidth to 12.5 kHz or narrower technology. After January 1, 2013, licensees not operating at 12.5 kHz efficiency will be in violation of the FCC's rules and could be subject to FCC enforcement action, which may include admonishment, monetary fines, or loss of license.

Information about narrowbanding benefits, frequently asked questions, links to information and resources and other relevant information may be obtained at www.fcc.gov/narrowbanding. Narrowbanding related questions may be submitted to the FCC at narrowbanding@fcc.gov.

The PCWIN Executive Management Committee has directed PCWIN staff to prepare a regional request for waiver to defer the need to narrowband frequencies and equipment for those agencies that will abandon the use of UHF/VHF spectrum licenses and equipment after PCWIN systems are cutover; currently scheduled for first quarter of calendar year 2014. If your agency will continue to operate on your UHF/VHF licenses after PCWIN cutover, you are required to narrowband your solutions prior to the January 1, 2013 deadline. A regional request for waiver is intended to seek approval for jurisdictions that will transition to 800 MHz spectrum, as a participant in the new PCWIN regional voice radio system, avoid unnecessary narrowbanding activities and cost. This process does not guarantee that a waiver will be granted. You are advised to plan a process that will enable your compliance with the narrowbanding requirement. Your process should include a determination of how narrowbanding will affect your system, a compliance plan, schedule and budget appropriation. A list of manufacturers and narrowband-compliant equipment is available at http://psc.apcointl.org/2010/01/01/narrowbanding/.

In accordance with the July 13, 2011, FCC Public Notice regarding guidance for submission of requests for waiver, this questionnaire is being distributed to gather information from agencies, to determine their commitment to participate in the PCWIN system, and to identify those interested in participating in a regional request for waiver.

The content of this questionnaire has been developed to satisfy the specific application requirements established by the FCC. A full and complete response is needed to determine your interest and eligibility to participate in a regional waiver request. 1) Do you wish to participate in a regional waiver request? Yes If NO, return the questionnaire. If YES, complete the questionnaire and return it. 2) What steps have you already taken to plan for, initiate, and complete the transition to narrowband operations? Had an assessment done of our current equipment to see if narrowband capable. Describe the size and complexity of your current system: Mount Lemmon runs off one repeater, and is dispatched by Drexel Heights Fire. 4) Describe any system upgrades or improvements, in addition to narrowbanding, that are planned: All our mobile and hand held radios are narrowband compatible. Our repeater is not, so we are in the process of pricing out a replacement. 5) If a waiver is granted, how will wideband operations after January 1, 2013, affect neighborhing systems, interoperability relationships, or other interdependencies? No

MOUNT LEMMON FIRE DISTRICT

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MOUNT LEMMON FIRE DISTRICT

Points of Con	act	
	Person completing this questionnaire:	Point of contact for follow up questions:
	. disen completing the questionname.	Total of contact for remote up quotions.
Agency:	MLFD	MLFD
Name:	Joseph A. Gunia	Joseph A. Gunia
Telephone:	520.444.6279	520.444.6279
E-Mail:	jqunia@mlfdaz.org	jgunia@mlfdaz.org
Address:	P.O. Box 759	P.O. Box 759
City, State: Zip Code:	Mount Lemmon, AZ 85619	Mount Lemmon, AZ 85619
Zip Code.	00013	00019
titional informa	ation is required on the Frequency Worksheet. Plea be relinquished after transition Direct any questions about the Pima County Larry Sayers at Larry.Sayers@ Return completed questionnaires	regional narrowbanding waiver request to pima.gov or (520) 400-7115.
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City of South Tucson Police & Fire Departments

- Cover Letters
- UHF/VHF Narrowbanding Questionnaire
- FCC Radio Frequency Information

MAYOR JENNIFER ECKSTROM CHIEF OF POLICE

RICHARD E. MUÑOZ



POLICE

1601 SOUTH SIXTH AVENUE SOUTH TUCSON, ARIZONA 85713

December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Waiver request for temporary extension of deadline to narrowband existing VHF/UHF radio systems

The City of South Tucson respectfully requests a waiver of FCC Rule Section 90.203(j) to be authorized a temporary extension of time to continue wideband operations on existing VHF and UHF radio systems. The City of South Tucson is part of a regional coordination plan and filing this request as one partner of the Pima County Wireless Integrated Network (PCWIN) coordinated waiver request. The amount of time for which a waiver is requested is no more than reasonably necessary to complete the move to the new regional 800 MHz PCWIN system.

By participating in the PCWIN project, the City of South Tucson has committed to replacing its legacy VHF and UHF radio systems. Therefore, our police and fire department is dependent on the project schedule and has no other reasonable alternative or additional resources to address narrowbanding for its legacy VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest. We believe a grant of this waiver request would be in the public interest since the intent of the PCWIN Project is to replace legacy systems with a single regional interoperable 800 MHz voice radio system, thereby satisfying the underlying purpose of the narrowbanding rule by promoting consolidation and spectrum efficiency.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until our police and fire department is fully transitioned to the regional 800 MHz PCWIN system. If you have any questions or require additional information regarding this request, please feel free to contact me at (520) 917-1580.

Chief Richard Muñoz

South Tucson Police Department

File cc:

MAYOR

JENNIFER ECKSTROM

VICE MAYOR
PETE TADEO

COUNCIL MEMBERS
JOHN FELIX, ACTING MAYOR
PAUL S. DIAZ
ANITA ROMERO
CARLOS G. SALAZ
MARY H. SOLTERO



1601 SOUTH SIXTH AVENUE SOUTH TUCSON, ARIZONA 85713 (520) 792-2424 FAX (520) 628-9619

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Sincerely₂

Chief Lafry Anderson

South Tucson Fire Department

UHF/VHF Narrowbanding Questionnaire

The Federal Communications Commission (FCC) has set January 1, 2013 as the deadline for all VHF and UHF Public Safety and Industrial/Business land mobile radio (LMR) systems in the 150-174 MHz and 421-512 MHz bands to migrate from 25 kHz channel bandwidth to 12.5 kHz or narrower technology. After January 1, 2013, licensees not operating at 12.5 kHz efficiency will be in violation of the FCC's rules and could be subject to FCC enforcement action, which may include admonishment, monetary fines, or loss of license.

Information about narrowbanding benefits, frequently asked questions, links to information and resources and other relevant information may be obtained at www.fcc.gov/narrowbanding. Narrowbanding related questions may be submitted to the FCC at narrowbanding@fcc.gov.

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wband operations? ontract includes communications equipment repair ipment. We have a police fleet of which 25 vehicles only have a need for 25 handheld radios.
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lan to follow their recommendations for upgrades an
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ly surrounded by the City of Tucson we rely on the rability and interdependencies are almost as though

SOUTH TUCSON POLICE DEPARTMENT and SOUTH TUCSON FIRE DEPARTMENT

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SOUTH TUCSON POLICE DEPARTMENT and SOUTH TUCSON FIRE DEPARTMENT

Does your agency designate Pima County to take the lead on the regional waiver request on your behalf? Person completing this questionairre: Point of contact for follow up questions: Agency: Richard E. Munoz Elephone: 520-917-1580 E-Mail: Rmunoz@southtucson.org Address: 1601 S. 6th Avenue City. State: Zip Code: 85713 Additional information is required on the Frequency Worksheet. Please describe how each frequency is used, and whether or not it will be relinquished after transitioning to the PCWIN system. Direct any questions about the Pima County regional narrowbanding waiver request to Larry Sayers at Larry.Sayers@pima.gov or (520) 400-7115. Return completed questionnaires and Frequency Worksheets to: Pima County Wireless Integrated Network Regional Narrowbanding Waiver Request 33 N. Stone Avenue, Suite 1810 Tucson, AZ 85701	Is your agency committed to migrating your voice communications to the PCWIN regional communications system? Poes your agency designate Pima County to take the lead on the regional waiver request on your behalf? Person completing this questionairre: Person completing this questionairre: Point of contact for follow up questions: Agency: City of South Tucson Police Department Name: Richard E. Munoz Elephone: S20-917-1580 S20-917-1580 S20-917-1582 Jinorio@southlucson.org Address: 1601 S. 6th Avenue City, State: South Tucson, Arizona Zip Code: 85713 Additional information is required on the Frequency Worksheet. Please describe how each frequency is used, and whether or not it will be relinquished after transitioning to the PCWIN system. Direct any questions about the Pima County regional narrowbanding waiver request to Larry Sayers at Larry. Sayers@pima.gov or (520) 400-7115. Return completed questionnaires and Frequency Worksheets to: Pima County Wireless Integrated Network Regional Narrowbanding Waiver Request 33 N. Stone Avenue, Suite 1810	Is your agency committed to migrating your voice communications to the PCWIN regional communications system? Poes your agency designate Pima County to take the lead on the regional waiver request on your behalf? Person completing this questionalrre: Point of contact for follow up questions: Agency: City of South Tucson Police Department Name: Richard E. Munoz Telephone: 520-917-1580 E-Mail: Rmunoz@southlucson.org Address: 1601 S. 6th Avenue City, State: South Tucson, Arizona Zip Code: 85713 Additional information is required on the Frequency Worksheet. Please describe how each frequency is used, and whether or not it will be relinquished after transitioning to the PCWIN system. Direct any questions about the Pima County regional narrowbanding waiver request to Larry Sayers at Larry, Sayers@pima.gov or (520) 400-7115. Return completed questionnaires and Frequency Worksheets to: Pima County Wireless Integrated Network Regional Narrowbanding Waiver Request 33 N. Stone Avenue, Suite 1810 Tucson, AZ 85701	We would rely o	on R.I.C.O. funds for the most part.	
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or by e-mail to Catherine Hanna@nima gov	or by e-mail to Catherine.Hanna@pima.gov	or by e-mail to Catherine.Hanna@pima.gov			
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CITY OF SOUTH TUCSON FCC RADIO FREQUENCIES

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City of Tucson Police & Fire Departments

- Cover Letters
- UHF/VHF Narrowbanding Questionnaire
- FCC Radio Frequency Information



Ready to Protect, Proud to Serve

tel: 520-791-444) fax: 520-791-5491 www.ci.tucson.az.us/police/ 270 S. Stone Avenue Tucson, Arizona 85701-1917

January 3, 2012

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re:

Waiver request for temporary extension of deadline to narrowband existing VHF/UHF radio systems

To Whom It May Concern:

The City of Tucson respectfully requests a waiver of FCC Rule Section 90.203(j) be authorized, requesting a temporary extension of time to continue wideband operations on existing VHF and UHF radio systems. The City is part of a regional coordination plan and is filing this request as one partner of the Pima County Wireless Integrated Network (PCWIN) coordinated waiver request. The amount of time for which a waiver is requested is no more than reasonably necessary to complete the move to the new regional 800 MHz PCWIN system.

By participating in the PCWIN project, the City of Tucson has committed to replacing its legacy VHF and UHF radio systems. Therefore, the City is dependent on the project schedule and has no other reasonable alternative or additional resources to address narrowbanding for its legacy VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest. We believe a grant of this waiver request would be in the public interest since the intent of the PCWIN Project is to replace legacy systems with a single regional interoperable 800 MHz voice radio system, thereby satisfying the underlying purpose of the narrowbanding rule by promoting consolidation and spectrum efficiency.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until the City is fully transitioned to the regional 800 MHz PCWIN system. If you have any questions or require additional information regarding this request, please feel free to contact me at (520) 791-4441.

Sincerely,

Roberto A. Villaseñor

Chief of Police

RAV:JJ:kr



CITY OF TUCSON December 28, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Waiver request for temporary extension of deadline to narrowband existing VHF/UHF radio systems

The City of Tucson respectfully requests a waiver of FCC Rule Section 90.203(j) to be authorized a temporary extension of time to continue wideband operations on existing VHF and UHF radio systems. The City is part of a regional coordination plan and is filing this request as one partner of the Pima County Wireless Integrated Network (PCWIN) coordinated waiver request. The amount of time for which a waiver is requested is no more than reasonably necessary to complete the move to the new regional 800 MHz PCWIN system.

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Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until the City is fully transitioned to the regional 800 MHz PCWIN system. If you have any questions or require additional information regarding this request, please feel free to contact me at (520)837-7009.

Sincerely,

Jim Critchley Fire Chief

THE OTHER

Tucson Fire Department

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UHF/VHF Narrowbanding Questionnaire

The Federal Communications Commission (FCC) has set January 1, 2013 as the deadline for all VHF and UHF Public Safety and Industrial/Business land mobile radio (LMR) systems in the 150-174 MHz and 421-512 MHz bands to migrate from 25 kHz channel bandwidth to 12.5 kHz or narrower technology. After January 1, 2013, licensees not operating at 12.5 kHz efficiency will be in violation of the FCC's rules and could be subject to FCC enforcement action, which may include admonishment, monetary fines, or loss of license.

Information about narrowbanding benefits, frequently asked questions, links to information and resources and other relevant information may be obtained at www.fcc.gov/narrowbanding. Narrowbanding related questions may be submitted to the FCC at narrowbanding@fcc.gov.

The PCWIN Executive Management Committee has directed PCWIN staff to prepare a regional request for waiver to defer the need to narrowband frequencies and equipment for those agencies that will abandon the use of UHF/VHF spectrum licenses and equipment after PCWIN systems are culover; currently scheduled for first quarter of calendar year 2014. If your agency will continue to operate on your UHF/VHF licenses after PCWIN cutover, you are required to narrowband your solutions prior to the January 1, 2013 deadline. A regional request for waiver is intended to seek approval for jurisdictions that will transition to 800 MHz spectrum, as a participant in the new PCWIN regional voice radio system, avoid unnecessary narrowbanding activities and cost. This process does not guarantee that a waiver will be granted. You are advised to plan a process that will enable your compliance with the narrowbanding requirement. Your process should include a determination of how narrowbanding will affect your system, a compliance plan, schedule and budget appropriation. A list of manufacturers and narrowband-compliant equipment is available at http://psc.apcoIntl.org/2010/01/01/narrowbanding/.

In accordance with the July 13, 2011, FCC Public Notice regarding guidance for submission of requests for waiver, this questionnaire is being distributed to gather information from agencies, to determine their committment to participate in the PCWIN system, and to identify those interested in participating in a regional request for waiver.

The content of this questionnaire has been developed to satisfy the specific application requirements established by the FCC. A full and complete resonate is needed to determine your interest and eliqibility to participate in a regional waiver request

	complete response is needed to determine your interest and eligibility to participate in a regional waiver request.
1	Do you wish to participate in a regional waiver request? Yes If NO, return the questionnaire. If YES, complete the questionnaire and return it.
2	What steps have you already taken to plan for, initiate, and complete the transition to narrowband operations? Tucson Fire has programmed all portable radios with narrowband UHF AIRS channels. No other steps have been taken to modify the existing conventional radio system for fire or MEDS operation. Tucson Police is in the process of programming the AIRS frequencies on their radios.
3	Describe the size and complexity of your current system:
	The City of Tucson Fire Department currently uses a conventional UHF radio system. The Tucson Police Department currently uses a conventional VHF radio system. Each frequency has a single transmitter site with a backup transmitter location and up to 12 voter/receiver sites that blanket the City's radio coverage area. There are eight repeated channels and two simplex channels for a total of 10 UHF frequencies for Tucson Fire and 13 repeated channels and five simplex channels for for a total of 18 VHF frequencies for Tucson Police.
1	Describe any system upgrades or improvements, in addition to narrowbanding, that are planned:
~	No radio system upgrades or improvements are planned for City of Tucson Fire Department or Police Dapartment other than adding narrowband AIRS channels to portable radios. The Tucson Fire Department and the Tucson Police Department plan to transition to the PCWIN radio system.
5	If a waiver is granted, how will wideband operations after January 1, 2013, affect neighborhing systems, interoperability relationships, or other interdependencies?
	If the waiver is granted we do not forsee a negetive impact on operations with neighboring systems. Tucson Fire and Tucson Police will have portable radios with narrowband AIRS channels for interoperability until PCWIN becomes operational in 2014.
6	After migrating communications services from your UHF/VHF system to the PCWIN 800 MHz system, will you relinquish UHF/VHF spectrum?
-	Yes (Please specify on the Frequency Worksheet which of your licenses will and will not be relinquished)

TUCSON FIRE DEPARTMENT and TUCSON POLICE DEPARTMENT

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Make:	General Electric	Model:	Mastr II (TPD)	Narrowband Capability:	Replacement Required	12
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Mobile	Radios:					
Make:	Motorola	Model:	Radius M1225(TPD)	Narrowband Capability:	Narrowband Capable	388
Make:	Motorola	Model:	CM 300(TPD)	Narrowband Capability:	Narrowband Capable	160
Make:	Motorola		XTL 5000(TPD)	Narrowband Capability:	Narrowband Capable	35
Aake:	Midland	Model:	XTR 70-1440B(TPD)	Narrowband Capability:	Replacement Required	34
Make:	Motorola	Model:	Radius M1225(TFD)	Narrowband Capability:	Narrowband Capable	71
Make:	Motorola	Model:	CM 300(TFD)	Narrowband Capability:	Narrowband Capable	53
Nake:	Motorola	Model:	MCX 100(TFD)	Narrowband Capability:	Replacement Required	21
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	Motorola		MT 1500(TPD)	Narrowband Capability:	Narrowband Capable	107
	Motorola		XTS 2500(TPD)	Narrowband Capability:	Narrowband Capable	33
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TUCSON FIRE DEPARTMENT and TUCSON POLICE DEPARTMENT

	er request is denied, what funding source will you use require government approval or a multi-year budget	e to achieve compliance? Describe your budgetiing process; process?
There is no fundin operating funds w	g source assigned for UHF/VHF radio system repla- hich will affect services alredy funded.	cement/mopdification. The budget will need to come from general
Budgetary Needs:	\$ 1,700,000.00 Enter the roug	ph order magnitude cost to replace/upgrade equipment.
9) Is your agency con	mmitted to migrating your voice communications to t	the PCWIN regional communications system?
10) Does your agency	designate Pima County to take the lead on the regi	onal waiver request on your behalf?
11) Points of Contact		
	Person completing this questionairre:	Point of contact for follow up questions:
Agency: Name:	City of Tucson, Information Technology Joseph Jakoby	City of Tucson, Fire Department Chief Jim Critchley
Telephone:	(520) 837-6054	(520) 837-7018
E-Mail: Address:	joe jakoby@tucsonaz.gov 481 W. Paseo Redondo	Jim.Critchley@tucsonaz.gov 300 S. Fire Central Place
City, State:	Tucson, AZ	Tucson, AZ
Zip Code:	85701	85701
	Direct any questions about the Pima Coun	ning to the PCWIN system. ty regional narrowbanding waiver request to @pima.gov or (520) 400-7115.
	Return completed questionnaire	es and Frequency Worksheets to:
	Regional Narrowbar 33 N. Stone Av	ss Integrated Network ding Waiver Request enue, Suite 1810 AZ 85701
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	or by e-mail to Cathe	rine.Hanna@pima.gov

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Pima County Sheriff's Department

- Cover Letters
 - o Ajo-Gibson Volunteer Fire Department
 - o Why Fire District
- UHF/VHF Narrowbanding Questionnaire
- FCC Radio Frequency Information

Why Fire District

301 S. Sonoyta Way – Why, AZ. 85321-9613 520-387-7766 – Fax 520-387-4218

whyfire@tabletoptelephone.com

02/14/12

To Whom It May Concern,

Why Fire District is requesting an extension of the deadline to narrowband our existing UHF/VHF wideband voice radio system; FCC Rule Section 90.203(j).

At this time we do not have the necessary equipment to comply with the FCC Rule change, and the expense of totally changing our existing radio communications system, not to mention the maintenance of the new equipment, is so overwhelming at this point that we, as an exceptionally small Arizona Fire District, are researching all possible ways of financing these changes.

The Why Fire District has committed to complying to the FCC changes for our VHF and UHF radio systems. However, our Fire District is financially unable to meet the current deadline and has no other reasonable alternative or additional resources to address narrowbanding for its existing VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until our Fire District is is able to fully transition to narrowband. If you have any questions or require additional information regarding this request, please feel free to contact me at (520) 387-7766.

Sincerely, Vern Denning Chief, Why Fire District



Ajo-Gibson Volunteer Fire Department PO Box 909 Ajo, AZ 85321

To Whom it may Concern

Chief David Tibbitt

Secretary KD Kelley

Captain Mark Coyle

Lieutenant JD Allen

Ajo/Gibson Volunteer Fire Department is requesting an extension of the deadline to narrowband the existing UHF/VHF wideband voice radio system know as Pima County F3; FCC Rule Section 90.203(j).

At this time we do not have the necessary equipment to comply with the FCC Rule change, and the expense of totally changing our existing radio communications system, not to mention the maintenance of the new equipment, is so overwhelming at this point that we, as an exceptionally small Arizona Fire Department, are researching all possible ways of financing these changes.

Ajo/Gibson Volunteer Fire Department has committed to complying to the FCC changes for the UHF and VHF radio systems. However at this time unable to meet the current deadline and has no other reasonable alternative or additional resources to address narrowbanding for its existing VHF/UHF systems. In view of the circumstances of this case, application of the narrowbanding rule would be unduly burdensome and contrary to the public interest.

Based on the issues listed above, we are requesting a favorable grant of this waiver request so that we may continue with our VHF/UHF wideband system operations until our Fire Department is able to fully transition to narrowband. If you have any questions or require additional information regarding this request, please feel free to contact me at (602)399-9382

Chief David Tibbitt
Ajo/Gibson Volunteer Fire Department

PIMA COUNTY

UHF/VHF Narrowbanding Questionnaire

The Federal Communications Commission (FCC) has set January 1, 2013 as the deadline for all VHF and UHF Public Safety and Industrial/Business land mobile radio (LMR) systems in the 150-174 MHz and 421-512 MHz bands to migrate from 25 kHz channel bandwidth to 12.5 kHz or narrower technology. After January 1, 2013, licensees not operating at 12.5 kHz efficiency will be in violation of the FCC's rules and could be subject to FCC enforcement action, which may include admonishment, monetary fines, or loss of license.

Information about narrowbanding benefits, frequently asked questions, links to information and resources and other relevant information may be obtained atwww.fcc.gov/narrowbanding Narrowbanding related questions may be submitted to the FCC atarrowbanding@fcc.gov.

The PCWIN Executive Management Committee has directed PCWIN staff to prepare a regional request for waiver to defer the need to narrowband frequencies and equipment for those agencies that will abandon the use of UHF/VHF spectrum licenses and equipment after PCWIN systems are cutover; currently scheduled for first quarter of calendar year 2014f your agency will continue to operate on your UHF/VHF licenses after PCWIN cutover, you are required to narrowband your solutions prior to the January 1, 2013 deadlineA regional request for waiver is intended to seek approval for jurisdictions that will transition to 800 MHz spectrum, as a participant in the new PCWIN regional voice radio system, avoid unnecessary narrowbanding activities and cost. This process does not guarantee that a waiver will be granted. You are advised to plan a process that will enable your compliance with the narrowbanding requirement. Your process should include a determination of how narrowbanding will affect your system, a compliance plan, schedule and budget appropriation. A list of manufacturers and narrowband-compliant equipment is available ahttp://psc.apcointl.org/2010/01/01/narrowbanding/

In accordance with the July 13, 2011, FCC Public Notice regarding guidance for submission of requests for waiver, this questionnaire is being distributed to gather information from agencies, to determine their committment to participate in the PCWIN system, and to identify those interested in participating in a regional request for waiver.

The content of this questionnaire has been developed to satisfy the specific application requirements established by the FCC. A full and

(complete response is needed to determine your interest and eligibility to participate in a regional waiver request.
1)	Do you wish to participate in a regional waiver request? Yes If NO, return the questionnaire, If YES, complete the questionnaire and return it.
2)	What steps have you already taken to plan for, initiate, and complete the transition to narrowband operations? The Pima County Sheriff's Department (PCSD) provides dispatch services for the Ajo-Gibson Volunteer Fire Department, Why Fire District and Ajo Ambulance via a VHF frequency licensed to Pima County. Both fire departments are small agencies in western Pima County lacking resources to narrowband their existing equipment or to provide PCSD with replacement equipment so we can continue to disptach them. PCSD operates a GE MASTR II VHF repeater on Childs Mountain and a GE MASTR II base station in the dispatch center. Neither are narrowband capable. These agencies are participants in the Pima County Wireless Integrated Network Project, a regional public safety communications system project that will replace multiple legacy systems by July 2014, including those operated by these agencies. We seek a temporary was to provide time to transition services to the new regional radio system.
3)	Describe the size and complexity of your current system:
	VHF conventional system with one repeater on Childs Mountain, Ajo, Pima County, Arizona. The repeater serves approximately 40 end use so lt provides voice and tone paging services to dispatch volunteer and part time fire and emergency medical responders.
41	Describe any system ungrades as improvements in addition to sesse that are already
4)	Describe any system upgrades or improvements, in addition to narrowbanding, that are planned: Pima County does not intend to upgrade or replace its equipment. By July 2014, the Pima County Wireless Integrated Network will go live and provide alternative communications capabilities.
5)	If a waiver is granted, how will wideband operations after January 1, 2013, affect neighborhing systems, interoperability relationships, or other
	If the waiver is granted, PCSD will continue to dispatch for the fire and EMS responders in a small rural community in western Pima County. We will also continue to have interoperable communications with U.S. Customs and Border Protection, and the National Park Service until alternative services are available through completion of the PCWIN project.
6)	After migrating communications services from your UHF/VHF system to the PCWIN 800 MHz system, will you relinquish UHF/VHF spectrum?
0	No (Please specify on the Frequency Worksheet which of your licenses will and will not be relinquished)

PIMA COUNTY

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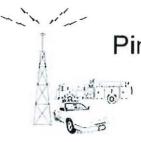
PIMA COUNTY

8) If a regional waiver request is denied, what funding source will you use to achieve compliance? Describe your budgetiing process; does your budget require government approval or a multi-year budget process? The fire and EMS providers will be required to replace County equipment or find and alternative dispatch agency. There are no local alternative dispatch agencies. The Why Fire District reports that approximately half of their mobile and portable radios are not narrowband capable and that they do not have the financial resources to replace the equipment. Budgetary Needs: \$ 15,000.00 Enter the rough order magnitude cost to replace/upgrade equipment. 9) Is your agency committed to migrating your voice communications to the PCWIN regional communications system? Yes 10) Does your agency designate Pima County to take the lead on the regional waiver request on your behalf? Yes 11) Points of Contact Person completing this questionairre: Point of contact for follow up questions: Agency: Pima County Sheriff's Department Pima County Sheriff's Department Name: Captain Paul Wilson Captain Paul Wilson Telephone: (520) 741-4878 (520) 741-4878 E-Mail: Paul.Wilson@sheriff.pima.gov Paul.Wilson@sheriff.pima.gov Address: 1750 E. Benson Hwy 1750 E. Benson Hwy City, State: Tucson, AZ Tucson, AZ Zip Code: 85714 85714 Additional information is required on the Frequency Worksheet. Please describe how each frequency is used, and whether or not it will be relinquished after transitioning to the PCWIN system. Direct any questions about the Pima County regional narrowbanding waiver request to Larry Sayers at Larry.Sayers@pima.gov or (520) 400-7115. Return completed questionnaires and Frequency Worksheets to: Pima County Wireless Integrated Network Regional Narrowbanding Waiver Request 33 N. Stone Avenue, Suite 1810 Tucson, AZ 85701 or by e-mail to Larry, Sayers@pima.gov

PIMA COUNTY FCC RADIO FREQUENCIES

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Entity Name	Call Sign		Location Name	Address	City										Ht @ Tip (meters)	Station Type		Freq		ERP	Data, or Other Communications	After Cutover to PCWINT (Yes or No)
PIMA, COUNTY OF	KLU459	2		1259 WELL RD	AJO	The second	TO STATE OF	STREET, SQUARE,	Contract of	and the same of	56.6	No. of Concession, Name of Street, or other Designation, Name of Stree	524		A STATE OF THE STATE OF	Base Stat	The Real Property lies, the Person lies,	155,4150	-	-	Voice	No
PIMA, COUNTY OF	KLU459	2		1259 WELL RD	AJO	32	22	56	112	51	56.6		524		15	Base Stat	1	155.7000	120	110	Voice	No
PIMA, COUNTY OF	KLU459	2		1259 WELL RD	AJO	32	22	56	112	51	56.6		524		15	Base Stat	1	155.6100	120	110	Voice	No
PIMA, COUNTY OF	KLU459	2		1259 WELL RD	AJO	32	22	56	112	51	56.6		524		15	Base Stat	1	155.4750	60	55	Voice	No
PIMA, COUNTY OF	KXV642	1		CHILDS MOUNTAIN	AJO	32	25	50	112	56	39.6		975		21	Base Stat	1	155.8950	120		Voice	No
PIMA, COUNTY OF	WYZ441	3		CHILDS MTN	AJO	32	25	50	112	56	39.6		975		15	Repeater	1	155.0850	100	400	Voice	No

EXHIBIT D



Pima County Wireless Integrated Network

Dece

Executive Management Committee:

Clarence W. Dupnik, Chair Pima County Sheriff

Mike Hein Pima County Office of Emergency Management

Chief Roberto Villaseñor Tucson Police Department

Chief Daniel Sharp Oro Valley Police Department

Chief Joseph Delgado Tohono O'odham Tribal Police

Chief Anthony Daykin University of Arizona Police Department

Chief Jim Critchley Tucson Fire Department

Chief Jeff Piechura Northwest Fire District

Chief Doug Chappell Drexel Heights Fire District December 27, 2011

Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The PCWIN Executive Management Committee encouraged the County to make this application. Some PCWIN participant agencies have counted on the implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the PCWIN radio network will not be completed by the January 2013 narrowbanding deadline. The PCWIN Executive Management Committee asks that the Federal Communications Commission grant Pima County's request to waive compliance requirements for the specific agencies detailed in the waiver request until July 1, 2014, so project participants can proceed with the implementation of the PCWIN regional voice radio system, and not bear the cost of narrowbanding outdated equipment, which will ultimately be replaced by our capital improvement project.

Our project and its participants continue to work diligently and in good faith to design and implement an interoperable network, giving our first responders the best technology and equipment to protect and serve the citizens of Pima County for years to come. Our project is complicated, but we are beginning to see the results of our hard work, and the hard work of those who support us in this effort. Voice and microwave radio contracts have been executed and the detail design for both technologies is complete. Site development is underway, and installation of equipment will begin in 2012.

Pima County WINS!



A 2004 Bond Project

Thank you for your consideration in this request. If you have additional questions or concerns, please contact Captain Paul Wilson, PCWIN Project Administrator at (520)724-7200.

Respectfully Submitted,

Clarence W. Dupnik, Chairman Sheriff of Pima County

CWD/crh

Avra Valley

15790 W. Silverbell Road Marana, AZ 85653-9577



Fire District

Phone (520) 682-3255 Fax (520-682-5458

December 29, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re. Pima County. Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C F R § 1.925(b)(3). Pima County. Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Avra Valley Fire District supports the Pima County Request for Waiver

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014 is reasonable. Pima County and its partners, including the Avra Valley Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Sincerely,

with the state of the

Fire Chief, Brian Delfs 1



CORONA de TUCSON FIRE DEPT



99 E. Tallahassee Dr. Corona de Tucson, AZ 85641 Administration Office (520) 762-5007 Fax (520) 762-5992

December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Corona de Tucson Fire Department supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Corona de Tucson Fire Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted.

Fire Chief Bruce Whitehouse Corona de Tucson Fire Department

Drexel Heights Fire District

5030 S. Camino Verde, Tucson, Arizona 85735-8971 Phone: (520) 883-4341 Fax: (520) 883-3314

www.drexelfire.net

Board of Directors

James Bertrand, Chair Cheryl Cecil, Clerk Laura Dailey Charles Mendonca David Tornbom

Fire Chief
Douglas Chappell

December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Drexel Heights Fire District supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Drexel Heights Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

Douglas E. Chappell, MPA, CFO Fire Chief / Administrator

ELEPHANT HEAD VOLUNTEER FIRE DEPARTMENT, INC.



January 3, 2012

December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Elephant Head Volunteer Fire Department supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Elephant Head Volunteer Fire Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

Assistant Chief Steve Hulland

Elephant Head Volunteer Fire Department



GOLDER RANCH FIRE DISTRICT

Fire ◆Rescue ◆Medical 3885 E. Golder Ranch Drive Tucson Arizona 85739 (520) 825-9001 / FAX (520) 825-8043



Chief Randy Karrer

December 29, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Golder Ranch Fire District supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Golder Ranch Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

Chief Randy Karrer
Golder Ranch Fire District

NORTHWEST FIRE DISTRICT





ADMINISTRATION/LIFE SAFETY SERVICES 5225 W. MASSINGALE RD. TUCSON AZ 85743

PHONE: (520) 887-1010 FAX: (520) 887-1034 www.northwestfire.org

December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Northwest Fire District supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Northwest Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrow banding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrow banding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

Chief Jeff Piechura Northwest Fire District



PASCUA YAQUI TRIBE



FIRE DEPARTMENT Pima County Wireless Integrated Network

Executive Management Committee:

Clarence W Dupnik, Chair Pima County Sheriff

Mike Hein Pima County Office of Emergency Management

Chief Roberto Villaseñor Tucson Police Department

Chief Daniel Sharp Gro Valley Police Department

Chief Joseph Delgado Tohono O'odham Tribal Police

Chief Anthony Daykin University of Anzona Police Department

Chief Jim Cntchley Tucson Fire Department

Chief Jeff Piechura Northwest Fire District

Chief Doug Chappell Drexel Heights Fire District December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3). Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Pascua Pueblo Fire Department supports the Pima County Request for Waiver

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Pascua Pueblo Fire Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.



A 2004 Bo 7474 S. Camino De Oeste • Tucson, Allzona 85746 • Phone (520) 879-5720 • FAX (520) 879-5730

PASCUA YAQUI TRIBE

FIRE DEPARTMENT



Respectfully Submitted,

Chief Andre Matus

Pascua Pueblo Fire Department



Picture Rocks Fire District

12121 W. Picture Rocks Road Tucson, AZ 85743-8773 Office (520) 682-7878 Fax (520) 682-0421

December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Picture Rocks Fire District supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Picture Rocks Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Brett Lane

Fire Okiet



Pima County Office of Emergency Management and Homeland Security

33 N. Stone Avenue, Ste. 1490, Tucson AZ 85701 (520) 798-0600 Office (520) 243-7550 Fax



December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Pima County Office of Emergency Management and Homeland Security supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Pima County Office of Emergency Management and Homeland Security, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

Director Mike Hein

Pima County Office of Emergency Management and Homeland Security



Bus. (520) 647-3760 Fax. (520) 647-7102 14550 E. Sands Ranch Road Vail, AZ, 85641 Emergency Telephone 911

December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Rincon Valley Fire District supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Rincon Valley Fire District, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

Chief Karen Lundberg Rincon Valley Fire District

Karen Lunalberg



TOHONO O'ODHAM NATION POLICE DEPARTMENT

P.O. Box 189
Sells, Arizona 85634
(520) 383-3276 Sells Line
(520) 622-1587 / 879-8900 Tucson Line
1(866) 573-8673 Toll Free



December 27, 2011

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The Tohono O'odham Tribal Police Department supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the Tohono O'odham Tribal Police Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Respectfully Submitted,

Joseph F. Delgado Chief of Police

Tohono O'odham Nation





January 3, 2012

Federal Communications Commission 1270 Fairfield Road Gettysburg, PA 17325

Re: Pima County, Arizona Request for Waiver of the Commission's Rules to Extend the Deadline for Transition to Narrowband Operations

Pursuant to Section 47 C.F.R. § 1.925(b)(3), Pima County, Arizona has respectfully submitted a Request for Waiver to the Federal Communications Commission on behalf of specific participants of the Pima County Wireless Integrated Network Project (PCWIN) to temporarily waive any Commission rules that would prohibit them from using licensed wideband VHF/UHF spectrum until Pima County's regional 800 MHz public safety voice radio network is complete.

The University of Arizona Police Department supports the Pima County Request for Waiver.

We support the Federal Communications Commission's efforts to narrowband for spectrum efficiency. However, we feel that an extension of the narrowband deadline to July 1, 2014, is reasonable. Pima County and its partners, including the University of Arizona Police Department, are working expeditiously to create a state-of-the-art radio system to serve approximately one million Pima County residents. Our first responders deserve the best equipment to protect and serve our community and this project offers that outcome.

Some of the PCWIN project participants have counted on the timely implementation of the PCWIN radio network to provide an alternative to narrowbanding obsolete VHF/UHF equipment. Unfortunately, the new regional network will not be completed by the January 2013 narrowbanding deadline.

It is unreasonable to expect agencies to expend precious resources to replace obsolete equipment that is to be replaced by the Pima County capital improvement project. We do not believe in the short term that public safety communications in our region will be negatively impacted by approval of the Pima County Request for Waiver.

Thank you for your consideration of Pima County's request. We support it and recommend approval.

Sincerely

Anthony Daykin Chief of Police